

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Replacement of Part 90 by )  
Part 88 to Revise the Private )  
Land Mobile Radio Services and )  
Modify the Policies Governing )  
Them )

PR Docket 92-235

To: The Commission

**COMMENTS OF THE COUNTY OF LOS ANGELES, CALIFORNIA**

The County of Los Angeles, California ("County"), by its attorneys, hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned "Spectrum Refarming" proceeding, FCC 92-469, released November 6, 1992.

The County has a population of 8.86 million persons in an area of over 4,000 square miles that includes such varied terrain as the densely populated Los Angeles Basin, mountain peaks and valleys, islands, and deserts. The County's public safety agencies, including the Sheriff's Department, Fire Department, and Emergency Medical Services Agency, are heavily dependent upon highly sophisticated area-wide land mobile radio communications systems. Most of these communications systems operate on frequencies below 512 MHz, and would be severely impacted by the Commission's spectrum refarming proposals. The County's principal concerns are with proposed reductions in channel bandwidth in the 450-512

transmitter power and antenna height for frequencies below 470 MHz.

The following is a brief description of the County's communications facilities and the specific impact of the proposed rule changes, and recommendations for alternative approaches that would achieve radio spectrum efficiency without disrupting critical public safety communications.

#### **L. THE COUNTY'S PUBLIC SAFETY COMMUNICATIONS SYSTEMS**

The principal radio frequencies for this communications system are on UHF channels 14 and 16 in the 470-512 MHz band. The UHF channel 16 frequencies were reallocated for public safety use in the Los Angeles area in 1985 to alleviate serious spectrum shortages. The Department's Channel 16 system was completed just three years ago at a cost of nearly \$60 million, funded through municipal bonds with payments extending beyond the year 2000.

B. Fire Department

The Los Angeles County Fire Department operates a UHF Mobile Digital Selective Call Unit system and both UHF and VHF (150-170 MHz) voice communications systems. There are 16 base stations serving 146 administrative sites and a fleet of 700 vehicles with over 1400 mobile UHF and VHF radios and 525 mobile data terminals. The Department utilizes 909 UHF and 677 VHF hand held radios to support field operations. This system was recently upgraded at a cost of \$25 million, raised through municipal bonds with payments extending beyond the year 2000.

C. Emergency Medical Services

The Emergency Medical Services Agency of Los Angeles County is an unusually large EMS agency, as it coordinates emergency medical care for 32 base hospitals, the highest geographic concentration of hospitals in the nation. The Agency relies on over 1,000 ambulances and mobile intensive care units that communicate with base hospitals through a radio communications network of 93 base stations. The

system makes over 600,000 radio contacts each year. The principal EMRS frequencies used by the Agency are nine pairs in the 450-470 MHz band.

**D. Other Public Safety Operations**

A variety of critical County government operations are coordinated through a separate UHF communications system in the 450-470 MHz band. These services include interdepartmental disaster coordination, parks patrol, building security, and probation services. The UHF communications system operates with approximately 800 portable and mobile radios, and 100 base stations, control stations, repeaters, and satellite voting receivers strategically located throughout the County.

**II. THE FCC'S PROPOSED REDUCTIONS IN BANDWIDTH WOULD REQUIRE EXTRAORDINARY AND PREMATURE EXPENDITURES BY THE COUNTY.**

The Commission's proposal would require that the County reduce the channel bandwidth of all of its 450-512 MHz radios from 25 kHz to 12.5 kHz by 1996. A second channel split, to 6.25 kHz, would be required by 2004. The first channel split would require the County to replace almost all of its existing 25 kHz system as equipment conversions are not feasible. The County has estimated that the cost of changing just the Sheriff's Department's communications system (most of which is only a few years old) to 12.5 kHz equipment would cost over \$67 million.<sup>1/</sup> Replacing the

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<sup>1/</sup> Cost estimates provided by County of Los Angeles Internal Services Department.

Fire Department's system with narrowband radios would cost over \$26 million (including its VHF channels).

The County cannot possibly bear the burden of these extraordinary expenses in the short time frame proposed by the Commission. Rather, it must be permitted to amortize fully its current equipment. The County does recognize, however, that it will need to replace equipment eventually and will need the additional channel capacity created by reductions in bandwidth. Therefore, the County urges the Commission to adopt an alternative plan for the 450-512 MHz bands similar to those proposed by the Associated Public-Safety Communications Officers ("APCO") and the Land Mobile Communications Counsel ("LMCC"). Those plans call for a mandatory split to 12.5 kHz, but not until ten years after the effective date of the Commission's Report and Order in this proceeding (i.e., approximately 2004).

The County has similar concerns regarding the proposed channel split for the 150-170 MHz band, in which some of its Fire Department frequencies are located. For that band, the County supports those alternative proposals that would allow ten years from the effective date of the Report and Order until a mandatory split to 12.5 kHz.

**III. THE COMMISSION'S PROPOSED REDUCTIONS IN TRANSMITTER  
POWER LIMITS WOULD PLACE UNDUE BURDEN ON THE COUNTY AND  
COMPROMISE CRITICAL PUBLIC SAFETY COMMUNICATIONS.**

The FCC has proposed new arbitrary height and power  
limits that are based on Height Above Average Terrain (HAAT)

manner possible. Therefore, the County supports APCO's alternative proposal that public safety frequency coordinators be allowed to limit power levels to that which is necessary to provide a specified signal level at the licensee's political boundaries.

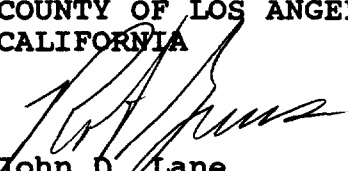
**CONCLUSION**

The County supports the Commission's goal of improving spectrum efficiency in land mobile radio frequencies. However, the Commission's proposed rules must be revised in the manner described above to avoid disruption to critical public safety communications.

Respectfully submitted,

COUNTY OF LOS ANGELES,  
CALIFORNIA

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